

# BakerHostetler

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October 22, 2019

**VIA ECF**

Honorable Dennis Montali  
United States Bankruptcy Judge  
450 Golden Gate Avenue, 16th Floor  
San Francisco, CA 94102

Robert A. Julian  
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*Re: In re PG&E*, Case No, 19-30088 (DM)

Your Honor:

At the October 7, 2019 estimation status conference, Judge Donato asked when he could expect the decision on the inverse briefing before this Court. *10/7/19 Hr'g Tr.*, at 26-27, attached hereto as Exhibit A. When we informed Judge Donato that the inverse issue is scheduled to be heard on December 11, 2019, he asked whether the schedule could be moved up. *Id.* We write to bring Judge Donato's request to Your Honor's attention and to propose a solution.

The current briefing schedule is as follows: the Debtors' brief is due on October 25, 2019, one opposition brief is due November 15, 2019, the Debtors' reply is due on November 22, 2019, and a hearing will be held on December 11, 2019. In response to Judge Donato's request, counsel for the TCC suggested to the Debtors that the parties revert to the original schedule that Your Honor had ordered on August 28, 2019: forego the hearing on December 11, 2019, and allow the matter to stand submitted after the opposition brief is filed on November 15, 2019. The Debtors did not agree with this suggestion. Accordingly, we ask Your Honor to consider the TCC's potential solution to forego the hearing in order to expedite the inverse condemnation briefing schedule, or other possible means to address Judge Donato's concern. We understand the Debtors' counsel will address the issue separately.

Thank you for your time and attention to this matter.

Sincerely,

/s/ Robert A. Julian

Robert A. Julian

encl.

cc: All Parties via ECF

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